

June 12, 2025

VIA ECF

Honorable Taryn A. Merkl
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Bartlett, et al. v. Société Générale de Banque au Liban S.A.L., et al.*,
Case No. 19-cv-007 (CBA) (TAM)**

Dear Judge Merkl:

We write on behalf of Moving Defendants¹ to provide a status report to the Court, pursuant to this Court's minute order dated November 18, 2024. Moving Defendants have provided a comprehensive report to Plaintiffs today regarding the scope of customer waivers that Moving Defendants have obtained (the "Report"). The Report discusses Moving Defendants' processes for seeking waivers and information about the discovery materials that have been and soon will be produced pursuant to those waivers.

The Report also provides, on a bank-by-bank basis, additional information breaking down the number of waivers obtained, the names of alleged customers who provided waivers, the percentage of waivers obtained to date, and for certain banks, the number of persons or entities alleged by Plaintiffs to have held accounts with a given bank who did not in fact have accounts during the relevant period.

In addition, the parties are scheduled to meet and confer in the coming days regarding discovery topics including the waiver report, Moving Defendants' proposal regarding Plaintiff Profile Forms, and unresolved issues that Moving Defendants have raised regarding Plaintiffs' productions.

Respectfully submitted,

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